

210 W. CARRILLO STREET
RADIO SQUARE PROJECT
FINAL MITIGATED NEGATIVE DECLARATION
RESPONSE TO COMMENTS

APRIL 10, 2008

INTRODUCTION:

An Initial Study was prepared for the subject project because the California Environmental Quality Act (CEQA) requires environmental assessment of the proposal. The Environmental Analyst found that, although the proposed project could potentially have significant adverse impacts related to air quality, cultural resources, hazards, noise, public services, and water environment, mitigation measures described in the Initial Study and agreed to by the applicant would reduce potential impacts to less than significant levels. In addition, recommended mitigation measures were identified to reduce less than significant impacts associated with biological resources, cultural resources, and transportation/circulation.

A Draft Mitigated Negative Declaration (MND) was prepared for the proposed project and a public review period was held from January 14, 2008 to February 4, 2008. The following submitted comment letters during the public review period:

1. Santa Barbara County Air Pollution Control District
2. League of Women Voters of Santa Barbara
3. Tracy Pfautch, General Manager, Paseo Nuevo
4. Allied Neighborhoods Association
5. Gil Barry
6. James Micallef
7. Lincoln Gray, Gray Family Trust and Eileen Gray

On January 24, 2008, the Planning Commission conducted a public hearing to accept comments regarding the Draft MND. The following individuals provided comments at the hearing:

1. Sheila Lodge
2. Nancy Caponi
3. Lincoln Gray
4. Violet Gray
5. Gil Barry
6. Catherine McCammon
7. Kellam de Forest

In addition to the speakers listed above, the Planning Commission provided comments regarding the Draft MND.

Responses to the comments received regarding the Draft MND are provided below and the comment letters received are attached.

The purpose of this document is to respond to specific comments received pertaining to environmental issues in the Draft MND. While letters of general support or opposition to the project are acknowledged and included in this document for the record, no formal response is provided. In addition, comments received not related to the environmental issues outlined in the Draft MND, such as land use issues and social or fiscal impacts of the project, are outside the scope and not addressed in this document. However, all comments will be forwarded to the Planning Commission for consideration.

Letter No. 1
Santa Barbara County Air Pollution Control District
January 29, 2008

Staff acknowledges that the APCD letter dated April 27, 2007 was received by the City; however, because it was a comment letter on the previous Initial Study for the project that was ultimately withdrawn, the comments were not incorporated into the Initial Study for the current project. The following are responses to comments regarding air quality provided in the January 29, 2008 letter.

- 1-1. **Comment:** "Asbestos Demolition/Renovation Notification" form to be submitted to APCD.
Response: The requirement that an "Asbestos Demolition/Renovation Notification" form is needed has been added as a condition of approval for the project. It should be noted that this is required for all demolitions within the City prior to building permit issuance.
- 1-2. **Comment:** APCD permit needed prior to soil remediation.
Response: The requirement that an APCD permit is needed prior to soil remediation has been added as a condition of approval for the project. It should be noted that Corrective Action Plans approved by the Santa Barbara Fire Department includes a condition requiring the appropriate permits from other agencies (APCD, grading, building, etc.).
- 1-3. **Comment:** Mitigation measures required to address diesel particulate matter.
Response: Except for the last item on the list, the air quality measures were already listed as recommended mitigation measures in the Initial Study (see AQ-9 through AQ-19). The last item has been added as a further clarification of one method of reducing air quality impacts. Some of the mitigation measures have been revised slightly to match the exact language in the APCD letter. All of the mitigation measures are included as required conditions of approval for the project.
- 1-4. **Comment:** APCD Authority to Construct permits required for diesel engines and boilers/water heaters.
Response: The requirement that APCD permits are needed prior to occupancy has been added as a condition of approval for the project.
- 1-5. **Comment:** Mitigation measure addressing idling of trucks.
Response: Mitigation measure AQ-18 has been revised to clarify and specify the information provided by this comment.
- 1-6. **Comment:** Recommendation that wood-burning fireplaces not be allowed.
Response: The recommendation that only gas fireplaces, not wood-burning fireplaces, be allowed in the residences has been added to the conditions of approval for this project. The Initial Study states that project impacts related to odors would be considered less than

significant.

- 1-7. **Comment:** Recommendations to reduce emissions of greenhouse gases.

Response: The proposed project must meet the requirements of the City's newly adopted Energy Ordinance which requires greater energy efficiency than Title 24. The project site is located on a major transit corridor, close to the MTD and Greyhound bus stations and is close to downtown, thereby encouraging the use of alternative modes of transportation. Standard conditions of approval regarding recycling have been included. The suggested condition of approval that increased street landscaping be encouraged has been included as well.

- 1-8. **Comment:** Restriction on uses in relation to sensitive land uses such as residences.

Response: The restriction regarding dry cleaners and gasoline dispensing facilities has been added as a condition of approval for this project although it is anticipated that these uses would not be proposed as part of the development.

Letter No. 2
League of Women Voters of Santa Barbara
February 4, 2008

- 2-1. **Comment:** Concerns that an Environmental Impact Report should be required.
Response: The Initial Study determined that the proposed project may have a significant effect on the environment; however, with identified mitigation measures agreed to by the applicant, potentially significant impacts in all issue areas would be avoided or reduced to less than significant levels. Because there is no substantial evidence that the project may have a significant effect, CEQA Guidelines direct the preparation of a MND.
- 2-2. **Comment:** Concerns regarding policy inconsistency, too much development, modification, neighborhood compatibility, El Pueblo Viejo District guidelines, proposed alternative project.
Response: The comments express concerns regarding the proposed project and do not address the adequacy of the Draft MND. Issues regarding policy inconsistency, too much development, modification, neighborhood compatibility, and the El Pueblo Viejo District guidelines are discussed in the staff report. The proposed alternative project presented by the applicant during the public review period has been revised further to include an additional affordable unit. This revised project is evaluated in the Initial Study.
- 2-3. **Comment:** Concerns regarding the project description, affordable units, unit sizes, common open space, further subdivision of commercial condominiums.
Response: The comments express concerns regarding the proposed project and do not address the adequacy of the Draft MND. A revised project description is included in the Initial Study. This revised project is evaluated in the Initial Study. Five commercial condominiums are currently proposed. Further subdivision of the condominiums may occur in the future and would be subject to further review and approval by the City. However, a further subdivision is not anticipated to result in a potentially significant impact given that all of the proposed non-residential square footage has been accounted for in this project. The affordable units, unit sizes, common open space and commercial condominiums are discussed in the staff report.
- 2-4. **Comment:** Concerns regarding environmental setting, neighborhood compatibility.
Response: Compatibility with the surrounding area, including all structures in the immediate vicinity, was addressed by the Historic Landmarks Commission (HLC). A physical model of the proposed project was created by the applicant and presented to the HLC and will be presented to the Planning Commission for consideration.
- 2-5. **Comment:** Concerns regarding visual aesthetics, potentially unmitigable significant impacts on views, views of the Mesa, story poles, neighborhood compatibility, landscape plan, paseos, El Pueblo Viejo District policies, lighting and glare.
Response: The Initial Study addresses potential impacts to public views. The Santa Ynez Mountain views, which are the only important scenic resource visible from public view points in this area along Carrillo Street, would not be substantially impacted by the project. Views of the Mesa are not identified in City policy documents as an important scenic resource; therefore,

any changes are not considered potentially significant. The project has been reduced from a four-story to a two- and three-story development. Compatibility with the neighborhood is addressed in the staff report. A sun/shade study was provided by the applicant and was reviewed by the HLC at their meeting of March 19, 2008.

Story poles are required to be installed prior to the Planning Commission hearing.

Lighting and glare is addressed in the Initial Study. All proposed residential and commercial exterior lighting would be subject to compliance with the requirements of SBMC Chapter 22.75, the City's Outdoor Lighting and Design Ordinance. The ordinance provides that exterior lighting be shielded and directed to the site such that no undue lighting or glare would affect surrounding residents or roads.

The comments expressing concerns regarding landscaping, paseos, green space, and El Pueblo Viejo District policies do not address the adequacy of the Draft Mitigated Negative Declaration. These issues are discussed in the staff report. A landscape plan is included in the proposed project plans.

- 2-6. **Comment:** Concerns regarding air quality, landscaping, sensitive receptors, truck trips, attached scientific studies.

Response: The Santa Barbara County Air Pollution Control District (SBAPCD) has commented on the project and all requirements addressing both short-term and long-term emissions have been incorporated as conditions of approval, including a condition that increased street landscaping shall be encouraged. The SBAPCD provides oversight on compliance with air quality standards in the City. The SBAPCD stated in their letter dated January 29, 2008 (see Letter #1), that they concur with the classification of air quality impacts evaluated in the Initial Study.

The Initial Study states that sensitive receptors could be affected by dust and particulates during site grading but that nuisance dust and particulates would be reduced to a less than significant level through application of dust control mitigation measures. These dust control mitigation measures are included in the conditions of approval for the proposed project.

It is estimated that approximately 24 trunk trips per day would be necessary to carry out the soil remediation and grading phases of the project (see response 2-12 below regarding construction traffic).

The comment letter includes an attachment, "Nine abstracts of recent scientific studies about the public health impacts of traffic-related air pollution." As stated above and in the Initial Study, any potential significant impacts associated with either short-term or long-term air quality can be reduced to less than significant and APCD concurs with the classification of air quality impacts evaluated in the Initial Study.

- 2-7. **Comment:** Concerns regarding geophysical conditions, liquefaction, high water table, subterranean parking structure, flooding.

Response: Liquefaction is addressed in the Preliminary Foundation Investigation report (Exhibit G of the Initial Study). It states that the potential for liquefaction is considered to be low since the soil below the two-level subterranean parking structure is stiff clay. For further clarification, in order for liquefaction to occur, both low density granular soils (i.e. sand, silty

sand, and some gravels) and a high groundwater table must be present. In this case, there is a high groundwater table but the soils are not low density.

The Initial Study states that any water encountered during excavation would be removed using a suitable dewatering system. An experienced dewatering contractor would be required to design and implement dewatering measures prior to the issuance of a building permit for the proposed project.

The Preliminary Foundation Investigation report also addresses moisture-sensitive flooring, if needed (see page 6 of the report), as well as drainage options such as a perimeter drain or basement wall drainage. An alternative would be to provide a watertight basement. The appropriate option would be determined prior to building permit issuance to ensure that flooding or water intrusion would not occur in the parking structure.

- 2-8. **Comment:** Concerns regarding hazards, Corrective Action Plan, groundwater monitoring, results, off-site wells.

Response: The California Regional Water Quality Control Board (CRWQCB) is the lead agency that oversees the approval and implementation of a Corrective Action Plan (CAP) for the soil and groundwater remediation project. A CAP has been approved for the project site. In May of 2007, the CRWQCB issued a public notice to all landowners and residents/occupants within a 500 foot radius of the project site. Others may contact the agency to be put on their interested parties list for future correspondence or to request information regarding the specifics of the CAP. According to CRWQCB, the offsite monitoring wells are no longer needed. Written evidence of completion of an approved Corrective Action Plan (CAP) is required to be submitted to the City prior to issuance of any building permits other than those permits necessary to complete the CAP.

- 2-9. **Comment:** Concerns regarding noise, potentially unmitigable significant impacts, inadequate mitigations, air conditioning, sustainability, aesthetic impact of noise barriers, HVAC on adjacent building, noticing as mitigation.

Response: The mitigation measure associated with the operational exterior noise impact is the installation of noise barriers on some balconies. The mitigation measure associated with the operational interior noise impacts is the implementation of a 'windows closed' condition for some residential units. The mitigation measures associated with temporary construction noise include limiting the hours of construction, shielding the stationary construction equipment with effective noise control devices, notification of construction to sensitive noise receptors, and locating stockpiling and vehicle staging areas as far as practical from sensitive noise receptors. The Initial Study concludes that the implementation of the identified mitigation measures would reduce operational interior and exterior noise impacts and temporary construction noise levels to less than significant levels.

The design of the noise barriers requires review and approval by the Historic Landmarks Commission.

The relocation of the HVAC on the adjacent property is not included as a mitigation measure; however, it is included in the discussion in the Initial Study because its potential relocation

would lead to a reduction in the heights of some of the noise barriers and would result in some units no longer being required to implement the 'windows closed' condition.

The installation of a ventilation/air conditioning system may be required for those units that require a 'windows closed' condition; however, it may be that all units, both residential and commercial, would have air conditioning systems anyway. The City may seek to discourage such systems as part of a sustainability goal but does not prohibit them.

The main purpose of the written notice requirement, other than to describe the proposed project, the construction schedule and the required noise reduction measures, is to provide adjacent property owners, business occupants, and residents with a mechanism to file complaints if there are any problems associated with the construction noise. If warranted, construction activities may be modified.

- 2-10. **Comment:** Concerns regarding population and housing, growth.

Response: The Housing Element of the General Plan indicates that there is an existing need (demand) for housing within the City. In addition, the proposed project is not in an undeveloped area nor does it require the extension or expansion of major infrastructure that could potentially lead to a substantial increase in growth. Therefore, the proposed project is not expected to induce substantial growth.

- 2-11. **Comment:** Concerns regarding recreation, parks for children, passive open space for adults, potentially significant impact.

Response: The proposed project provides substantially more than the minimum required amount of private and common open space onsite. As stated in the Initial Study, Spencer Adams Park, the Louise Lowry Davis Center and the Westside Community Center, as well as Alameda Park and Alice Keck Park Memorial Gardens are all within a one-half mile of the project site and provide additional open space and park and recreation facilities for future residents needs. The one-half mile radius is considered a convenient walking distance and is a National Recreation and Park Association standard.

- 2-12. **Comment:** Concerns regarding traffic, alternative transportation, access, cumulative traffic, trips associated with grading, interruption of traffic, noticing, alternate routes.

Response: An analysis of potential traffic impacts provided in the Initial Study concludes that with the implementation of proposed mitigation measures, short- and long-term impacts of the project could be reduced to a less than significant level.

Alternative transportation would be encouraged due to the proposed project being located on a major transit corridor, close to downtown, and close to both the MTD and Greyhound bus stations.

It was determined that ingress and egress from Carrillo Street would result in less traffic in the surrounding residential neighborhood than if ingress and egress were only allowed on De la Vina Street. Outbound turns onto Carrillo Street would be restricted to right turns only.

The Traffic Study indicates that the project would not add traffic during the AM peak hour and

would reduce traffic during the PM peak hour; therefore, no project-specific or cumulative impacts would be generated. Hence, a cumulative project list was not required to be incorporated into the traffic study.

As stated in the Initial Study, temporary construction traffic, which includes traffic associated with grading (hauling of cut and fill material), is generally considered an adverse but not significant impact that is reduced further with the implementation of standard mitigation measures. The standard mitigation measures are included as conditions of approval. It is estimated that 24 trips per day associated with the proposed grading would be required. The haul routes for all construction-related trucks, three tons or more, are subject to the approval of the Transportation Manager and are established to minimize trips through residential neighborhoods and minimize congestion.

The proposed project is also subject to the standard condition of approval prohibiting the storage or staging of construction materials and equipment within the public right-of-way, unless approved by the Transportation Manager. In addition, a traffic control plan is also required to be submitted for review and approval by the Transportation Manager. A detour plan is required as part of the traffic control plan. Any request from the applicant to use a portion of the right of way or to temporarily close a portion of the street during construction would require a Public Works permit, subject to the approval of the Transportation Manager. Temporary permits would only be issued for specified purposes and for limited time periods. In recognition of the potential for temporary traffic interference to occur when lanes are closed, it has become the City's practice to be more stringent in permitting any use of the public right of way.

A condition of approval has been added to this project that requires the applicant to conduct a public outreach program when a permit has been issued to use any portion of the public right of way subject to the review and approval of the Transportation Manager. The public outreach program shall include noticing in the newspaper and/or on the applicant's or project's website. The public outreach shall include a description of the permit (location, timeline, etc.) and shall include the detour plan and or suggestions for alternate routes.

2-13. **Comment:** Concerns regarding new proposal.

Response: The alternative project presented by the applicant during the public review period has been revised further to include one additional affordable unit, and is evaluated in the Initial Study.

2-14. **Comment:** Concerns that the Initial Study is unacceptable.

Response: Refer to response 2-1 above.

Letter No. 3

Tracy Pfautch, General Manager, Paseo Nuevo Shopping Center
January 24, 2008

- 3-1. **Comment:** Concerns regarding street closures on Carrillo, De la Vina, Chapala and Bath Streets.
Response: Refer to response 2-12 above.

Letter No. 4
Allied Neighborhoods Association
January 27, 2008

- 4-1. **Comment:** Concerns regarding visual impacts on surrounding neighborhoods.
Response: Refer to responses 2-4 and 2-5 above.
- 4-2. **Comment:** Concerns regarding impacts on the historic buildings located in the area.
Response: A revised focused Historic Structures/Sites Letter Report (HSR) prepared by Preservation Planning Associates, dated March 25, 2008 was accepted by the HLC on April 2, 2008. The report includes the following recommended mitigation measure, "A modification of the massing of that portion of the project immediately adjacent to the neighborhood to the north should be incorporated into the design, subject to review and approval by the Historic Landmarks Commission after Planning Commission approval of the project."
- 4-3. **Comment:** Concerns regarding traffic and parking.
Response: Refer to response 2-12 above regarding traffic. Also, the proposed project meets the Zoning Ordinance requirements for parking.
- 4-4. **Comment:** Concerns regarding air quality.
Response: Refer to response 2-6 above.
- 4-5. **Comment:** Concerns regarding noise.
Response: Refer to response 2-9 above.
- 4-6. **Comment:** Concerns regarding open space for residents.
Response: Refer to response 2-11 above.
- 4-7. **Comment:** Concerns that an Environmental Impact Report should be required.
Response: Refer to response 2-1 above.

Letter No. 5
Gil Barry
January 23, 2008

- 5-1. **Comment:** Concerns regarding an Environmental Impact Report should be required.
Response: Refer to response 2-1 above.
- 5-2. **Comment:** Concerns regarding air quality, "hot pocket" at intersection.
Response: Refer to response 2-6 above. Also, the "hot pocket" comment refers to the City's Master Environmental Assessment air quality map, which shows West Carrillo Street as an area of carbon monoxide build up, also called a hot spot. The map is based on information gathered in the early 1980's and is considered to be out of date. Since that time, air quality regulations have resulted in an improvement in air quality in the City. The City is in the process of updating all of the MEA maps and it is expected that the carbon monoxide build up areas are to be removed from the maps.
- 5-3. **Comment:** Concerns regarding soils and groundwater.
Response: Refer to responses 2-7 and 2-8 above.
- 5-4. **Comment:** Concerns regarding seismic safety, liquefaction.
Response: Refer to response 2-7 above. Also, the City has accepted the conclusion of the Preliminary Foundation Investigation report that the potential for liquefaction is low. For further clarification, in order for liquefaction to occur, both low density granular soils (i.e. sand, silty sand, and some gravels) and a high groundwater table must be present. In this case, there is a high groundwater table but the soils are not low density.
- 5-5. **Comment:** Concerns regarding visual resources.
Response: Refer to response 2-5 above. Also, on March 19, 2008, the HLC reviewed the revised project as well as the physical model presented by the applicant and continued the project to the Planning Commission stating that the building mass is generally acceptable and the project is compatible with the neighborhood. The floor area ratio (FAR) is not used by the HLC to determine neighborhood compatibility.
- 5-6. **Comment:** Concerns regarding noise, ventilation.
Response: Refer to response 2-9 above regarding noise. Refer to response 5-2 above regarding air quality. Also, the new building code does not require natural air ventilation in residences.
- 5-7. **Comment:** Concerns regarding traffic.
Response: Refer to response 2-12 above. Also, it is the City's practice to use ITE trip generation in determining any potential impact associated with new development and does not conduct trip counts for all existing development in the City. Please note that the project description has been revised with the current proposal consisting of 32 residential units and a revised traffic study was prepared to address the change in the project description.
- 5-8. **Comment:** Concerns regarding revised project.
Response: Refer to response 2-13 above.

Letter No. 6
James Micallef
January 24, 2008

- 6-1. **Comment:** Concerns regarding review of the project, review of MTD project nearby, EIR required.
Response: The City is required to consider separately the Radio Square project that has been submitted for review. The MTD project is also under separate review at the City. Because the Initial Study indicates that no cumulative traffic impacts would be generated by the project, a cumulative analysis is not required. Refer to response 2-1 above.
- 6-2. **Comment:** Concerns regarding four-story project should be rejected.
Response: The revised project no longer includes a fourth story. The comment expresses a concern regarding the proposed project and does not address the adequacy of the Draft MND.
- 6-3. **Comment:** Concerns regarding three-story project requires an EIR.
Response: Refer to response 2-1 above.
- 6-4. **Comment:** Concerns regarding parking spaces.
Response: The proposed project meets the Zoning Ordinance requirements for parking.
- 6-5. **Comment:** Concerns regarding entry/exit on Carrillo Street, traffic.
Response: Refer to response 2-12 above.

Letter No. 7

Lincoln Gray, Gray Family Trust and Eileen Gray
February 3, 2008

- 7-1. **Comment:** Concerns regarding short-term impacts, noise.
Response: Refer to response 2-9 above. Also, noise-generating construction activities are only allowed weekdays between the hours of 8:00 a.m. and 5:00 p.m. with occasional night work approved for the hours between 5 p.m. and 8 a.m. on weekdays only, if approved by the Chief of Building and Zoning.
- 7-2. **Comment:** Concerns regarding short-term impacts, traffic, staging on De la Vina Street, blocking access.
Response: Blocking of access to adjacent properties would not be allowed. Refer to response 2-12 above.
- 7-3. **Comment:** Concerns regarding short-term impacts, toxic dust.
Response: Refer to response 2-8 above.
- 7-4. **Comment:** Concerns regarding long-term impacts, affordable housing, traffic.
Response: The project was reduced in size based on comments received from the Historic Landmarks Commission, the Planning Commission and the public. A reduction in the mass resulted in the elimination of all but five of the affordable units. In regard to traffic, refer to response 2-12 above.
- 7-5. **Comment:** Concerns regarding long-term impacts, historical resources.
Response: Refer to response 4-2 above.
- 7-6. **Comment:** Concerns regarding long-term impacts, parks.
Response: Refer to response 2-11 above.
- 7-7. **Comment:** Concerns regarding long-term impacts, traffic.
Response: Refer to response 2-12 above. Also, as stated in the Initial Study, the Fire Department has reviewed the proposed project and the emergency access has been approved with the understanding that the median located on the western most portion of Carrillo Street will be fully removed and that the median to prevent left hand turns from taking place onto Carrillo Street will be the only new median for the project in order to maintain adequate emergency vehicular access from Fire Station #1 to the west.
- 7-8. **Comment:** Concerns regarding an Environmental Impact Report should be required.
Response: Refer to response 2-1 above.

The following comments were provided by people who attended the environmental hearing on January 24, 2008.

Sheila Lodge. Ms. Lodge, Citizens Planning Association (CPA), South Coast Land Use Committee, read a prepared statement that included: requesting a full EIR for the project; requested consideration of the proximity of cultural resources to the project to be considered in the EIR; that the method staff uses for project eligibility for a MND be publicly reviewed for the public's understanding of the process; asked that the Master Environmental Assessment be reviewed to determine if it is accurate and up to date in terms of cumulative impact analysis; asked that there be a public discussion regarding how staff determined that a project meets neighborhood compatibility policies; and asked that the Commission discuss with staff whether mixed-use projects along congested traffic corridors meet the intent of Measure E. She also read a statement for Naomi Kovacs, Executive Director, CPA, who was concerned with the Planning Commission looking at the alternative project with little public notice and how the Initial Study might be revised as a result.

Response: Regarding requesting an EIR (see response 2-1 above); regarding cultural resources (see response 4-2 above); regarding MND determination (see response 2-1 above; also staff determines, based on submitted technical reports, whether or not there is a potential for a significant impact, and the document are available to the public for review); regarding MEA (staff is currently in the process of updating the MEA maps); regarding neighborhood compatibility (see staff report); regarding mixed-use projects (see staff report); regarding public notice of alternate proposal (see response 2-13 above).

Nancy Caponi. Ms. Caponi, a neighbor, expressed concern over any increased density and traffic; would like to see wider sidewalks.

Response: Regarding traffic, refer to response 2-12 above. The sidewalk along Carrillo Street would be widened to become an 8-foot wide sidewalk with a 4 foot wide parkway. The De la Vina sidewalk would remain at 10 foot wide and is in conformance with the intent of the City's adopted Pedestrian Master Plan.

Lincoln Gray. Comments provided by Mr. Gray were similar to the comments provided in his letter dated February 3, 2008.

Response: Refer to the responses for Letter No. 7.

Violet Gray. Comments provided by Ms. Gray were similar to the comments provided in the letter dated February 3, 2008.

Response: Refer to the responses for Letter No. 7.

Gil Barry. Comments provided by Mr. Barry were similar to the comments provided in his letter dated January 23, 2008.

Response: Refer to the responses for Letter No. 5.

Catherine McCammon. Comments provided by Ms. McCammon were similar to the comments provided in her letter dated February 4, 2008.

Response: Refer to the responses for Letter No. 2.

Kellam de Forest. Mr. de Forest asked that heights be reduced to 35 feet in the EPV district and 40 feet elsewhere as stated in the proposed charter amendment currently being circulated; requested that

an EIR be required; stated that a HSR be required due to the project being near historic resources; and expressed concern over the loss of the previously proposed park plaza on Chapala and Carrillo.

Response: The comments expressing concerns regarding heights and the previously proposed plaza do not address the adequacy of the Draft Mitigated Negative Declaration. Regarding requiring an EIR (see response 2-1 above). Regarding historic resources (see response 2-1 above).

The following comments regarding the Draft MND were provided by the Planning Commission:

The Initial Study/Draft Mitigated Negative Declaration is adequate and the only revisions would be to add additional language to the Recreation section regarding how the neighborhood is underserved by parks.

Response: Additional language has been added to the Recreation section of the Initial Study regarding how the West Downtown neighborhood may appear to be underserved by parks. Both Alameda Park and Alice Keck Park Memorial Gardens have been added into the description of the existing recreational facilities within walking distance of the project site.

CONCLUSION

The environmental analysis demonstrates that, with the identified mitigation measures agreed to by the applicant, the project as proposed would not result in significant environmental impacts. The project therefore qualifies for a Mitigated Negative Declaration and no further analysis of alternatives is required as part of the environmental document. However, comments regarding the merits of the project, design alternatives, land use compatibility with surrounding residential uses and other planning issues are forwarded to decision-makers in the context of their consideration of project permits and planning policy consistency.



**Santa Barbara County
Air Pollution Control District**

January 29, 2008

Kathleen Kennedy, Associate Planner
City of Santa Barbara Planning Division
P.O. Box 1990
Santa Barbara, CA 93102-1990

RECEIVED

JAN 30 2008

CITY OF SANTA BARBARA
PLANNING DIVISION

RE: 210 W. Carrillo Street "Radio Square Project: Draft Mitigated Negative Declaration"

Dear Ms. Kennedy,

The Santa Barbara County Air Pollution Control District (APCD) appreciates the opportunity to provide comments on the Draft MND for the above-mentioned project. In the interest of full disclosure, the APCD sent a letter, dated April 27, 2007, to the City on this project which does not appear to have been taken into consideration during the preparation of this MND. The APCD concurs with the classification of air quality impacts in the MND and notes the requirement for measures to reduce fugitive dust impacts during construction. We recommend the following **additional updated conditions of approval** for this project:

1. As required by the National Emissions Standards for Hazardous Air Pollutants (NESHAP), prior to demolition of any structure, a completed "Asbestos Demolition/Renovation Notification" form (which can be downloaded from <http://www.sbapcd.org/biz/asbestos.htm>) must be delivered to the APCD no later than the date specified in Section I.B.1 of the instructions.
2. As mentioned in the Hazards section of the Initial Study, the project site contains soil and groundwater contaminated with perchloroethylene (PERC). The California Air Resources Board (ARB) has identified PERC as a toxic air contaminant. Exposure to PERC has acute non-cancer effects, chronic non-cancer effects and cancer effects to humans. Potential acute (i.e., short term 1 hour) effects may include loss of coordination, eye, nose and throat irritation, headache and light-headedness. Excavation and stockpiling of the contaminated soil may result in exposure of any residents or employees of the commercial uses around the project site. As mentioned in the April 27, 2007 APCD letter to the City, the APCD will require a review of the *Corrective Action Plan* in order to determine satisfactory controls are included, and the soil remediation project will require a permit from the APCD, well prior to commencement of any clean-up activities.
3. Diesel particulate matter is the number one carcinogen in California. In order to protect public health during construction, the following measures are required to be implemented to reduce diesel particulate matter and NOx emissions from construction equipment:
 - Construction contracts must specify that only heavy-duty diesel-powered construction equipment manufactured after 1996 (with federally mandated "clean" diesel engines) will be used.
 - The engine size of construction equipment shall be the minimum practical size.

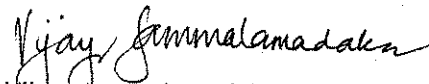
Terence E. Dressler • Air Pollution Control Officer

- The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
 - Construction equipment shall be maintained in tune per the manufacturer's specifications.
 - Construction equipment operating onsite shall be equipped with two to four degree engine timing retard or pre-combustion chamber engines.
 - Catalytic converters shall be installed on gasoline-powered equipment, if feasible.
 - Diesel catalytic converters, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by EPA or California shall be installed.
 - Diesel powered equipment should be replaced by electric equipment whenever feasible.
 - Idling of heavy-duty diesel trucks during loading and unloading shall be limited to five minutes; auxiliary power units should be used whenever possible.
 - Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite.
4. Prior to occupancy, APCD Authority to Construct permits are required for diesel engines rated at 50 bhp and greater (e.g., emergency standby generators) and boilers/large water heaters whose combined heat input rating exceeds 2.0 million BTUs per hour.
5. At all times, idling of heavy-duty diesel trucks during loading and unloading must be limited to five minutes; auxiliary power units should be used whenever possible. State law requires that drivers of diesel-fueled commercial vehicles weighing more than 10,000 pounds:
- a. shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location,
 - b. shall not idle a diesel-fueled auxiliary power system (APS) for more than 5 minutes to power a heater, air conditioner, or any ancillary equipment on the vehicle if you have a sleeper berth and you're within 100 feet of a restricted area (homes and schools).
6. Wood-burning fireplaces are the cause of many public nuisance complaints that the APCD receives during the winter months. We recommend that only gas fireplaces be allowed in the new residences. Gas fireplace means a fireplace or any other listed gas appliance as defined in the Uniform Mechanical Code designed to burn natural gas in a manner that simulates the appearance of a wood burning fireplace and does not burn anything other than natural gas.
7. Global climate change is a concern. A project participates in this impact through its incremental contribution combined with the cumulative increase of all other sources of greenhouse gases. Therefore, we strongly recommend that, at a minimum, this project can reduce emissions of greenhouse gases by:
- Increasing energy efficiency beyond Title 24 requirements;
 - Encouraging the use of transit, bicycling and walking;
 - Increasing recycling goals (e.g., separate waste and recycling receptacles); and

- Increasing street landscaping (shade trees decrease energy requirements and also provide carbon storage.)
8. Pursuant to the distances recommended by the California Air Resources Board in their *Air Quality and Land Use Handbook (April 2005)*¹, for the siting of sensitive land uses (such as residences) the following conditions of approval are required:
- Dry cleaners using Perchloroethylene shall not be located within 300 feet of any residential use. For dry cleaning operations with two or more machines, provide 500 feet. For operations with 3 or more machines, consult with the local air district.
 - Typical gasoline dispensing facilities shall not be sited within 50 feet of a residential use. A gas dispensing facility with a throughput of 3.6 million gallons per year or greater shall not be sited within 300 feet of a residential use.

Please ensure that all the above recommended conditions of project approval are enforceable by the City. Please contact me by phone at 961-8893, or by e-mail: VLJ@sbcapcd.org if you have questions.

Sincerely,



Vijaya Jammalamadaka

Air Quality Specialist

Technology and Environmental Assessment Division

cc: Michael Zois, APCD
Michael Goldman, APCD
Project file (City of SB: Radio Square Project)
TEA Chron File

¹ The Handbook can be found on the ARB's website at <http://www.arb.ca.gov/ch/handbook.pdf>.

League of Women Voters of Santa Barbara
328 East Carrillo Street, Suite A
Santa Barbara, California 93101

February 4, 2008

City of Santa Barbara Planning Division
630 Garden Street
Santa Barbara, CA

Attention: Kathleen A Kennedy, Associate Planner
kkennedy@santabarbaraca.gov

RE: Comments on Draft Mitigated Negative Declaration for 210 W. Carrillo Street

The League of Women Voters of Santa Barbara believes that an Environmental Impact Report should be required for this project. A Mitigated Negative Declaration is not appropriate. We believe that there are several areas where this project may have potential significant impacts that are not fully discussed in the Draft Initial Study dated January 14, 2008.

The purpose of an Environmental Impact Report is to bring together all of the information for decision-makers and the public to be able to assess the changes to the environment as a result of the project. Having a bunch of technical studies attached is not adequate, this information needs to be brought forth in the analysis in an EIR. Having information set forth in later staff reports separate from the Initial Study is not adequate. For example, if an EIR was done there would be a discussion in detail of policy consistency. In the Initial Study it says this is to follow in staff reports. This totally ignores that a major policy inconsistency can be a Potential Significant Class I Unmitigable Impact. We believe that having just an Initial Study is totally inadequate for this project and fails to properly analyze and discuss the different impact areas and therefore misses the mark on what could be potentially significant impacts.

We are concerned that this project is trying to put too much development on this lot and will require a modification to do this. In addition, we do not believe that this project is compatible with the neighborhood and that it does not meet the EPV guidelines. We support the concerns raised by the HLC. We are interested in the proposed alternative project that has been put forth by the developer as on the surface it appears to address some of the concerns that we have with the project that is the subject of the Initial Study. But of course we would need to see an Initial Study done on that project.

Project Description:

Please clarify the project description. While we are pleased to see that 21 of the 55 units will be affordable, we want to know at what level of affordability these units will be offered and why all

of the bonus units are not affordable. What are the sizes of the individual units? Will the affordable-housing be under control of the Housing Authority? What is the amount of common open space for the residential condos? Is it anticipated that the two 11,604 square foot commercial condominiums will be further subdivided into individual lots per the Subdivision Map Act at a later date? If so, how many lots would be allowed and/or are contemplated?

Environmental Setting:

In order to judge compatibility with the surrounding setting the whole area needs to be considered. Compatibility should be based on compatibility the surrounding buildings not just on the fact that there is one taller building a block down. Even if one looks at the taller buildings on Carrillo Street, they are three and two stories, not four. The buildings, including residential buildings on De la Vina Street are one and two stories. There should be a buffer or transition area between these low buildings and the proposed four stories.

Visual Aesthetics:

We believe that there are potentially unmitigable significant impacts on views.

Far more discussion of blockage of views needs to be included. A four story building can not help but be a significant visual change to the area. As this is one of the gateways to the City, many people driving by see these views and they see them for a longer time if stuck in the traffic. The before photo showing the Santa Ynez Mountains is not adequate. The one on-line is taken with a tree in the way, Also, views of Mesa as seen from De la Vina Street are totally lacking. These should be included in the EIR. Story poles need to be required for this project.

There should be pictures of the adjacent buildings to put this project in context. This should include more views from De la Vina showing the residential part and the other close one and two story structures. A full discussion of the compatibility or incompatibility of a four story building with adjacent buildings should be included in an EIR. The analysis of sun/shade on adjacent buildings should be included.

What is the landscaping plan? Will landscaping be required on both the Carrillo and De la Vina sides of the project? Where will the paseos be located? Will there be any green space with plantings located in the interior of the project? Please discuss the implications on landscaping when a structure is built over under ground parking. Will this result in use of planters and pots everywhere?

Please discuss the consistency and/or inconsistency with the El Pueblo Viejo policies. Since there is presently a lot of controversy about the wisdom of putting a 4 story building in the El Pueblo Viejo, there needs to be a discussion of how such a project will be compatible and fit in with the character, the size and scale of the El Pueblo Viejo. At the Planning Commission Hearing Commissioner Stella Larsen quoted the current Land Use Element of the General Plan. Please discuss how you can find that this project can overcome the inconsistency with this document.

The EIR should include the impacts of the lighting and glare and what the specific mitigations

will be now, so that the public and decision makers will know this information in advance. The impacts on adjoining properties should be discussed.

Air Quality:

There should be some discussion in the EIR of the role of landscaping as a mitigation to the pollutants generated by the traffic on Carrillo Street.

Since the City does not have quantitative thresholds of significance for short-term or construction and uses the SBCAPCD standard of 25 tons of pollutants averaged over a 12 month period, how do you know if there will not be specific months when the pollution is hazardous to health? This is especially significant since the Initial Study states that sensitive receptors could be affected by dust and particulates during grading. We believe that the pollution from the construction is a potentially significant impact on sensitive receptors that this should be mitigated. Monitoring on a monthly basis should be required.

What are the number of truck trips that are proposed during the long construction period, especially during the remediation and grading phases?

In the Initial Study, there is no mention or discussion of the impacts on sensitive receptors, especially of children, living on this site next to a congested major arterial. There have been numerous studies on this topic and yet there is no mention of this potential public health hazard. This is a potentially significant impact and a full discussion needs to be included in an EIR. Please see Attachment A, for further information on this topic.

Geophysical Conditions:

The Initial Study does not contain adequate information on liquefaction as a potential result of the high water table. According to the Geological Study "The shallowest reported groundwater was detected at a depth of 17 feet..." and "it is our opinion that shallow groundwater levels are near historic highs."

There should also be a discussion of the implications of this potentially high water table and the subterranean parking structure. What measures will be taken to prevent this parking structure from flooding?

Hazards:

The EIR needs to go into more detail on the potential hazards and the Corrective Mitigation Plan. When is the ground water monitoring to be implemented and why is it only on a semi-annual basis? Will the results be known before construction? What is the potential for problems and how will they be mitigated? Where are the off-site wells?

Noise:

We believe that there are potentially unmitigable significant impacts as a result of noise

levels. The noise levels for both the exterior and interior of the project exceed the city's acceptable thresholds and the mitigations are inadequate.

We are concerned about the impacts of noise levels on both the people living in the units and the surrounding area. We are also concerned with the interior noise levels. The idea of a "windows closed" requirement is not acceptable, especially when the mitigation is only mechanical vents. People will want to open their windows and thus be exposed to loss of hearing and other health impacts.

Will air conditioning be required? What is the impact of this energy use on sustainability goals?

The initial study states that barriers will have to be used to protect people in their outdoor living space. What will these look like and what will be the aesthetic impact as a result of this mitigation requiring further mitigation? The same is true of the mitigation of noise from the HVAC unit on the Sav-on building. The only reliable mitigation is barriers. Actions by the third party owner are not acceptable as mitigations and cannot be relied on unless this mitigation is done prior to approval of the project.

We have always been concerned about the idea that Notice to adjacent residents is considered an adequate mitigation to extreme construction noise especially when the construction is to take place over a long period of time. While providing notice is a good step, this is not really mitigation of the noise level. There is no mitigation for this impact. All that is being done is to tell people that if they are sensitive they should leave.

Population and Housing:

We question the statement that "The proposed residential units are intended to meet existing demand for ownership housing units within the community and would not induce growth" (emphasis added). What is the basis for this assumption? What is to stop people from outside the area from purchasing these units? This is especially troublesome, when under the discussion on Schools it says: "Some portion of new employees may in-migrate. The commercial portion of the proposed project may generate new elementary and secondary students to the extent that new employment created by the project results in new residents to the area." Is there not a possibility that these "new employees" might want to live here?

Recreation:

While we agree that there are plenty of parks throughout the city, the Initial Study confirms that some areas may be currently under-served with neighborhood and community parks. The Initial Study says that for the West Downtown Neighborhood there is the Spenser Adams Park (lawn bowling), the Louise Lowry Davis Center and the Westside Community Center. We do not see that there are any close parks for children to easily walk to and play in nor is there passive open space for adults. We see the need for a neighborhood park and we believe that this is a potentially significant impact that should be mitigated with some provision for open space at or very near the project site.

Transportation:

This project is located in one of the most congested areas of the City and as such will add traffic to an already impacted area. At rush hour the traffic forms a solid line for several blocks as people line up to get on the freeway. That intersection is a level F. We are specifically concerned about the traffic that will be generated by this project and the congestion it will add to the already congested intersections.

Because this project is near to the transit hub, will anything be done to encourage people to use alternative transportation?

We believe that access and egress should not be allowed on Carrillo Street as this will further congest the area. We do not see how this will work during rush hour. How will cars get in and out of the project when there is a solid line of traffic that they must cross?

Also, there needs to be a list of other proposed projects, such as the MTD project, in the area, that will also add to the cumulative amount of traffic and decreased levels of service at the intersections.

As the two levels of under ground parking will require a huge amount of grading, we are concerned about the grading itself and the impacts of the number of trips the grading will generate during construction. What impacts will this have on the area and the immediate neighborhood? There needs to be further information and analysis of the number of trips and what mitigations should be required.

The EIR should also cover the number of times, how and how long traffic on Carrillo will have to be interrupted during construction and what mitigations if any can be done to avoid this additional problem and the related congestion. We have noticed that every time a large project on a major street such as Carrillo or Chapala is developed there is a considerable time when a part of the major street is closed off. There should be mitigations for this, such as notices in the paper and other places that tell when this is going to happen and what alternative routes can be taken.. Alternative routes need to be made available and clearly marked so drivers are aware of the problem soon enough to avoid the troubled areas and take the alternatives.

If an EIR is done then a smaller project, such as the one proposed, could be looked at as an Alternative. Then we would know more about the new proposal.

In summary the Initial Study is totally unacceptable. The discussions of the different areas are inadequate in some areas and missing in others. These problems would potentially be solved by an EIR that would fully disclose the impacts of this project.

Thank you for this opportunity to comment,

Cathie McCammon, League of Women Voters' Land Use Consultant, mccammon@cox.net

Attachment A

Nine abstracts of recent scientific studies about the public health impact of traffic-related air pollution (chronologically ordered between 2001 and 2007)

Assembled by Paul Hernadi on Earth Day 2007

1. "Urban air pollution and health inequities: a workshop report"

By the American Lung Association

Environ Health Perspect. 2001 Jun; 109 Suppl 3:357-74

Abstract

Over the past three decades, an array of legislation with attendant regulations has been implemented to enhance the quality of the environment and thereby improve the public's health. Despite the many beneficial changes that have followed, there remains a disproportionately higher prevalence of harmful environmental exposures, particularly air pollution, for certain populations. These populations most often reside in urban settings, have low socioeconomic status, and include a large proportion of ethnic minorities. The disparities between racial/ethnic minority and/or low-income populations in cities and the general population in terms of environmental exposures and related health risks have prompted the "environmental justice" or "environmental equity" movement, which strives to create cleaner environments for the most polluted communities. Achieving cleaner environments will require interventions based on scientific data specific to the populations at risk; however, research in this area has been relatively limited. To assess the current scientific information on urban air pollution and its health impacts and to help set the agenda for immediate intervention and future research, the American Lung Association organized an invited workshop on Urban Air Pollution and Health Inequities held 22-24 October 1999 in Washington, DC. This report builds on literature reviews and summarizes the discussions of working groups charged with addressing key areas relevant to air pollution and health effects in urban environments. An overview was provided of the state of the science for health impacts of air pollution and technologies available for air quality monitoring and exposure assessment. The working groups then prioritized research needs to address the knowledge gaps and developed recommendations for community interventions and public policy to begin to remedy the exposure and health inequities.

2. "Air Pollution from Traffic and the Development of Respiratory Infections and Asthmatic and Allergic Symptoms in Children"

By Michael Brauer, Gerard Hoek, Patricia Van Vliet, Kees Meliefste, Paul H. Fischer, Alet Wijga, Laurens P. Koopman, Herman J. Neijens, Jorrit Gerritsen, Marjan Kerkhof, Joachim Heinrich, Tom Bellander and Bert Brunekreef

American Journal of Respiratory and Critical Care Medicine Vol 166. pp. 1092-1098, (2002)

Correspondence and requests for reprints should be addressed to Dr. Michael Brauer, School of Occupational and Environmental Hygiene, University of British Columbia, 2206 East Mall, Vancouver, BC, V6T 1Z3 Canada. E-mail: brauer@interchange.ubc.ca

Abstract

Despite the important contribution of traffic sources to urban air quality, relatively few studies have evaluated the effects of traffic-related air pollution on health, such as its influence on the development of asthma and other childhood respiratory diseases. We examined the relationship between traffic-related air pollution and the development of asthmatic/allergic symptoms and respiratory infections in a birth cohort (n ~ 4,000) study in The Netherlands. A validated model was used to assign outdoor concentrations of traffic-related air pollutants (nitrogen dioxide, particulate matter less than 2.5 µm in aerodynamic diameter, and "soot") at the home of each subject of the cohort. Questionnaire-derived data on wheezing, dry nighttime cough, ear, nose, and throat infections, skin rash, and physician-diagnosed asthma, bronchitis, influenza, and eczema at 2 years of age were analyzed in relation to air pollutants. Adjusted odds ratios for wheezing, physician-diagnosed asthma, ear/nose/throat infections, and flu/serious colds indicated positive associations with air pollutants, some of which reached borderline statistical significance. No associations were observed for the other health outcomes analyzed. Sensitivity analyses generally supported these results and suggested somewhat stronger associations with traffic, for asthma that was diagnosed before 1 year of age. These findings are subject to confirmation at older ages, when asthma can be more readily diagnosed.

Key Words: asthma • allergy • respiratory infections • air pollution • vehicle emissions

3. "Ambient Air Pollution and Atherosclerosis in Los Angeles"

By Nino Künzli, Michael Jerrett, Wendy J. Mack, Bernardo Beckerman, Laurie LaBree, Frank Gilliland, Duncan Thomas, John Peters, and Howard N. Hodis

Environ Health Perspect. 2005 February; 113(2): 201–206.

Published online 2004 November 22. doi: 10.1289/ehp.7523.

Address correspondence to N. Künzli, Keck School of Medicine University of Southern California, Division of Environmental Health, 1540 Alcazar St. CHP 236, Los Angeles, CA 90033-9013 USA. Telephone: (323) 442-2870. Fax: (323) 442-3272. E-mail: kuenzli@usc.edu

Abstract

Associations have been found between long-term exposure to ambient air pollution and cardiovascular morbidity and mortality. The contribution of air pollution to atherosclerosis that underlies many cardiovascular diseases has not been investigated. Animal data suggest that ambient particulate matter (PM) may contribute to atherogenesis. We used data on 798 participants from two clinical trials to investigate the association between atherosclerosis and long-term exposure to ambient PM up to 2.5 μm in aerodynamic diameter (PM_{2.5}). Baseline data included assessment of the carotid intima-media thickness (CIMT), a measure of subclinical atherosclerosis. We geocoded subjects' residential areas to assign annual mean concentrations of ambient PM_{2.5}. Exposure values were assigned from a PM_{2.5} surface derived from a geostatistical model. Individually assigned annual mean PM_{2.5} concentrations ranged from 5.2 to 26.9 $\mu\text{g}/\text{m}^3$ (mean, 20.3). For a cross-sectional exposure contrast of 10 $\mu\text{g}/\text{m}^3$ PM_{2.5}, CIMT increased by 5.9% (95% confidence interval, 1–11%). Adjustment for age reduced the coefficients, but further adjustment for covariates indicated robust estimates in the range of 3.9–4.3% (p-values, 0.05–0.1). Among older subjects (≥ 60 years of age), women, never smokers, and those reporting lipid-lowering treatment at baseline, the associations of PM_{2.5} and CIMT were larger with the strongest associations in women ≥ 60 years of age (15.7%, 5.7–26.6%). These results represent the first epidemiologic evidence of an association between atherosclerosis and ambient air pollution. Given the leading role of

cardiovascular disease as a cause of death and the large populations exposed to ambient PM_{2.5}, these findings may be important and need further confirmation.

Keywords: air pollution, atherosclerosis, particulate matter

4. "A review and evaluation of intraurban air pollution exposure models"

By Jerrett M, Arain A, Kanaroglou P, Beckerman B, Potoglou D, Sahsuvaroglu T, Morrison J, Giovis C.

J Expo Anal Environ Epidemiol. 2005 Mar; 15(2):185-204

Abstract

The development of models to assess air pollution exposures within cities for assignment to subjects in health studies has been identified as a priority area for future research. This paper reviews models for assessing intraurban exposure under six classes, including: (i) proximity-based assessments, (ii) statistical interpolation, (iii) land use regression models, (iv) line dispersion models, (v) integrated emission-meteorological models, and (vi) hybrid models combining personal or household exposure monitoring with one of the preceding methods. We enrich this review of the modelling procedures and results with applied examples from Hamilton, Canada. In addition, we qualitatively evaluate the models based on key criteria important to health effects assessment research. Hybrid models appear well suited to overcoming the problem of achieving population representative samples while understanding the role of exposure variation at the individual level. Remote sensing and activity-space analysis will complement refinements in pre-existing methods, and with expected advances, the field of exposure assessment may help to reduce scientific uncertainties that now impede policy intervention aimed at protecting public health.

Correspondence: jerrett@usc.edu at Division of Biostatistics, Departments of Preventive Medicine and Geography, University of Southern California, 1540 Alcazar Street, CHP-220, Los Angeles, CA 90089, USA.

5. "Is it traffic type, volume, or distance? Wheezing in infants living near truck and bus traffic"

By Ryan PH, LeMasters G, Biagini J, Bernstein D, Grinshpun SA, Shukla R, Wilson K, Villareal M, Burkle J, Lockey J.

J Allergy Clin Immunol. 2005 Aug;116(2):279-84

Correspondence: ryanph@email.uc.edu at Department of Environmental Health, University of Cincinnati, Cincinnati, OH 45267-0056, USA.

BACKGROUND: Previous studies of air pollution have not examined the association between exposure to varying types, distance, and amounts of traffic and wheezing in very young infants. **OBJECTIVE:** We sought to determine the relationship between types of traffic, traffic volume, and distance and wheezing among infants less than 1 year of age. **METHODS:** A geographic information system and a classification scheme were developed to categorize infants enrolled in the study as living near moving truck and bus traffic (highway >50 miles per hour, >1000 trucks daily, <400 m), stop-and-go truck and bus traffic (<50 miles per hour, <100 m), or unexposed and not residing near either. Symptom data were based on health questionnaires administered to parents when the infants were 6 months of age and monthly health diaries. **RESULTS:** Infants living very near (<100 m) stop-and-go bus and truck traffic had a significantly increased prevalence of wheezing (adjusted odds ratio, 2.50; 95% CI, 1.15-5.42) when compared with unexposed infants. The prevalence of wheezing among nonwhite infants was at least twice that of white infants, regardless of exposure. Infants living less than 400 m from a high volume of moving traffic, however, did not have an increased prevalence of wheezing. **CONCLUSION:** These results suggest that the distance from and type of traffic exposures are more significant risk factors than traffic volume for wheezing in early infancy.

6. "Spatial Analysis of Air Pollution and Mortality in Los Angeles."

By Jerrett, Michael; Burnett, Richard T; Ma, Renjun; Pope, C Arden III ; Krewski, Daniel; Newbold, K Bruce; Thurston, George; Shi, Yuanli; Finkelstein, Norm; Calle, Eugenia E; Thun, Michael J.

Epidemiology. 16(6):727-736, November 2005.

Abstract:

Background: The assessment of air pollution exposure using only community average concentrations may lead to measurement error that lowers estimates of the health burden attributable to poor air quality. To test

this hypothesis, we modeled the association between air pollution and mortality using small-area exposure measures in Los Angeles, California.

Methods: Data on 22,905 subjects were extracted from the American Cancer Society cohort for the period 1982-2000 (5,856 deaths). Pollution exposures were interpolated from 23 fine particle (PM_{2.5}) and 42 ozone (O₃) fixed-site monitors. Proximity to expressways was tested as a measure of traffic pollution. We assessed associations in standard and spatial multilevel Cox regression models.

Results: After controlling for 44 individual covariates, all-cause mortality had a relative risk (RR) of 1.17 (95% confidence interval = 1.05-1.30) for an increase of 10 [mu]g/m³ PM_{2.5} and a RR of 1.11 (0.99-1.25) with maximal control for both individual and contextual confounders. The RRs for mortality resulting from ischemic heart disease and lung cancer deaths were elevated, in the range of 1.24-1.6, depending on the model used. These PM results were robust to adjustments for O₃ and expressway exposure.

Conclusion: Our results suggest the chronic health effects associated with within-city gradients in exposure to PM_{2.5} may be even larger than previously reported across metropolitan areas. We observed effects nearly 3 times greater than in models relying on comparisons between communities. We also found specificity in cause of death, with PM_{2.5} associated more strongly with ischemic heart disease than with cardiopulmonary or all-cause mortality.

7. "Traffic, Susceptibility, and Childhood Asthma"

By Rob McConnell, Kiros Berhane, Ling Yao, Michael Jerrett, Fred Lurmann, Frank Gilliland, Nino Künzli, Jim Gauderman, Ed Avol, Duncan Thomas, and John Peters

Environmental Health Perspectives Volume 114, Number 5, May 2006
Address correspondence to R. McConnell, Department of Preventive Medicine, USC Keck School of Medicine, 1540 Alcazar St., CHP 236, Los Angeles, CA 90033 USA. Telephone: (323) 442-1096. Fax: (323) 442-3272. E-mail: rmconne@usc.edu

Abstract

Results from studies of traffic and childhood asthma have been inconsistent, but there has been little systematic evaluation of susceptible subgroups. In this study, we examined the relationship of local traffic-related exposure and asthma and wheeze in southern California school children (5-7 years of age). Lifetime history of doctor-diagnosed asthma and prevalent asthma and wheeze were evaluated by questionnaire. Parental history of asthma and child's history of allergic symptoms, sex, and early-life exposure (residence at the same home since 2 years of age) were examined as susceptibility factors. Residential exposure was assessed by proximity to a major road and by modeling exposure to local traffic-related pollutants. Residence within 75 m of a major road was associated with an increased risk of lifetime asthma [odds ratio (OR) = 1.29 ; 95% confidence interval (CI) , 1.01-1.86], prevalent asthma (OR = 1.50 ; 95% CI, 1.16-1.95) , and wheeze (OR = 1.40 ; 95% CI, 1.09-1.78) . Susceptibility increased in long-term residents with no parental history of asthma for lifetime asthma (OR = 1.85 ; 95% CI, 1.11-3.09) , prevalent asthma (OR = 2.46 ; 95% CI, 0.48-4.09) , and recent wheeze (OR = 2.74 ; 95% CI, 1.71-4.39) . The higher risk of asthma near a major road decreased to background rates at 150-200 m from the road. In children with a parental history of asthma and in children moving to the residence after 2 years of age, there was no increased risk associated with exposure. Effect of residential proximity to roadways was also larger in girls. A similar pattern of effects was observed with traffic-modeled exposure. These results indicate that residence near a major road is associated with asthma. The reason for larger effects in those with no parental history of asthma merits further investigation. Key words: air pollution, asthma, child, epidemiology, traffic.

Concluding paragraph of article

We conclude that living in a residence with more nearby traffic increases the risk of childhood asthma. Children with no parental history of asthma who had long-term residential exposure (or early-life exposure) constituted a susceptible population, and the risk was larger for girls than for boys. Because a substantial number of southern California children live near a major road, this exposure is potentially an important public health problem that could be remediable by transportation and residential development policy and by more effective control of vehicular emissions. Among those long-term residents with no parental history of asthma who lived within 75 m of a major road, 59% of asthma was attributable to residential proximity to the road. Further investigation is warranted to understand why the absence

of parental asthma history increased susceptibility to traffic-related exposure.

8. "Traffic-Related Air Pollution and Otitis Media"

By Michael Brauer, Ulrike Gehring, Bert Brunekreef, Johan de Jongste, Jorrit Gerritsen, Maroeska Rovers, Heinz-Erich Wichmann, Alet Wijga, and Joachim Heinrich

Environ Health Perspect. 2006 September; 114(9): 1414–1418.

Published online 2006 April 26. doi: 10.1289/ehp.9089.

Address correspondence to M. Brauer, School of Occupational and Environmental Hygiene, University of British Columbia, 3rd Floor, 2206 East Mall, Vancouver BC V6T1Z3 Canada. Telephone (604) 822-9585. Fax: (604) 822-9588. E-mail: brauer@interchange.ubc.ca

Abstract

Background. Otitis media is one of the most common infections in young children. Although exposure to environmental tobacco smoke is a known risk factor associated with otitis media, little information is available regarding the potential association with air pollution.

Objective. We set out to study the relationship between exposure to traffic-related air pollution and otitis media in two birth cohorts.

Methods. Individual estimates of outdoor concentrations of traffic-related air pollutants—nitrogen dioxide, fine particles [particulate matter with aerodynamic diameters $\leq 2.5 \mu\text{m}$ (PM_{2.5})], and elemental carbon—were calculated for home addresses of approximately 3,700 and 650 infants from birth cohort studies in the Netherlands and Germany, respectively. Air pollution exposure was analyzed in relation to physician diagnosis of otitis media in the first 2 years of life.

Results. Odds ratios (adjusted for known major risk factors) for otitis media indicated positive associations with traffic-related air pollutants. An increase in $3 \mu\text{g}/\text{m}^3$ PM_{2.5}, $0.5 \mu\text{g}/\text{m}^3$ elemental carbon, and $10 \mu\text{g}/\text{m}^3$ NO₂ was associated with odds ratios of 1.13 (95% confidence interval, 1.00–1.27),

1.10 (1.00–1.22), and 1.14 (1.03–1.27) in the Netherlands and 1.24 (0.84–1.83), 1.10 (0.86–1.41), and 1.14 (0.87–1.49) in Germany, respectively.

Conclusions. These findings indicate an association between exposure to traffic-related air pollutants and the incidence of otitis media. Given the ubiquitous nature of air pollution exposure and the importance of otitis media to children's health, these findings have significant public health implications.

Keywords: air pollution, cohort studies, infant, otitis media, vehicle emissions

9. "Effect of exposure to traffic on lung development from 10 to 18 years of age: a cohort study"

By W James Gauderman, Hita Vora, Rob McConnell, Kiros Berhane, Frank Gilliland, Duncan Thomas, Fred Lurmann, Edward Avol, Nino Kunzli, Michael Jerrett, John Peters

www.thelancet.com

Published online January 26, 2007 DOI:10.1016/S0140-6736(07)60037-3

Correspondence to: Dr W James Gauderman jimg@usc.edu

Department of Preventive Medicine, University of Southern California,
1540 Alcazar Street, Suite 220, Los Angeles, CA 90033, USA

Summary

Background: Whether local exposure to major roadways adversely affects lung-function growth during the period of rapid lung development that takes place between 10 and 18 years of age is unknown. This study investigated the association between residential exposure to traffic and 8-year lung-function growth.

Methods: In this prospective study, 3677 children (mean age 10 years [SD 0.44]) participated from 12 southern California communities that represent a wide range in regional air quality. Children were followed up for 8 years, with yearly lung-function measurements recorded. For each child, we identified several indicators of residential exposure to traffic from large roads. Regression analysis was used to establish whether 8-year growth in lung function was associated with local traffic exposure, and whether local traffic effects were independent of regional air quality.

Findings: Children who lived within 500 m of a freeway (motorway) had substantial deficits in 8-year growth of forced expiratory volume in 1 s (FEV1, -81 mL, $p=0.01$ [95%CI -143 to -18]) and maximum midexpiratory flow rate (MMEF, -127 mL/s, $p=0.03$ [-243 to -11]), compared with children who lived at least 1500 m from a freeway. Joint models showed that both local exposure to freeways and regional air pollution had detrimental, and independent, effects on lung-function growth. Pronounced deficits in attained lung function at age 18 years were recorded for those living within 500 m of a freeway, with mean percent-predicted 97.0% for FEV1 ($p=0.013$, relative to >1500 m [95%CI 94.6 -99.4]) and 93.4% for MMEF ($p=0.006$ [95%CI 89.1 -97.7]).

Interpretation: Local exposure to traffic on a freeway has adverse effects on children's lung development, which are independent of regional air quality, and which could result in important deficits in attained lung function in later life.

MadisonMarquette

creating special places

TO: Kathleen Kennedy
Associate Planner

FROM: Tracy Pfautch
General Manager, Paseo Nuevo

DATE: January 24, 2008

RE: Radio Square Project – Construction traffic impact

While we support development improvements in the downtown area, activities associated with the construction of the Radio Square Project – deliveries, staging, contractor parking, dumpsters - need to be confined to the property site. The management of Paseo Nuevo is strongly opposed to street and/or lane closures (Carrillo, De La Vina, Chapala, and Bath) during the construction of this project for any amount of time.

Chapala Street is a primary north-south corridor through downtown Santa Barbara and a key connection to Carrillo and the 101 interchange. Our experience demonstrates that anytime a lane has been blocked off on Chapala or surrounding streets, even for a few hours, extensive backup occurs. This includes traffic on the street itself as well as for vehicles exiting the Paseo Nuevo parking garage onto Chapala St. This creates a dangerous and frustrating situation for drivers.

The number one concern of Paseo Nuevo customers is traffic congestion on the streets around the center. Paseo Nuevo retailers as a whole generate millions of tax dollars to the city. Anything that inconveniences customers impacts sales, which in turn negatively impacts tax revenues to Santa Barbara.

As the project is still in the review stages, Paseo Nuevo urges planners to prohibit any street or partial street closures on Carrillo, De La Vina, Bath, and Chapala Streets.

Kennedy, Kathleen

From: Rodriguez, Julie on behalf of Community Development PC Secretary
Sent: Friday, February 01, 2008 8:14 AM
To: Bruce Bartlett; Jacobs, Charmaine; Jostes, John; Larson, Stella; Myers, George C.; Thompson, Addison; White, Bendy
Cc: Kennedy, Kathleen; Hubbell, Jan
Subject: FW: Public Comment Letter received for 222 W. Carrillo Street

From: Joe Rution [mailto:joerution@cox.net]
Sent: Sunday, January 27, 2008 10:46 AM
To: Community Development PC Secretary
Subject:

ALLIED NEIGHBORHOODS ASSOCIATION

Planning Division. City of Santa Barbara
P.O. Box 1990
Santa Barbara Ca., 93102

January 27, 2008

Re: Radio Square, 210 W. Carrillo Street

Attention: K. Kennedy

Dear Members of the Planning Commission:

Public testimony at the recent planning commission hearing clearly showed that the project at 210 W. Carrillo has the potential for unmitigated significant adverse impacts. Even the last minute changes proposed by the applicant fail to eliminate completely the potential impacts.

Issues that need to be examined are:

- Visual impacts on surrounding neighborhoods.
- Impacts on the historic buildings located in the area.
- Traffic and parking impacts. Since the city cannot regulate the number of cars owned by a person this issue is critical.
- Air quality for the potential residents since recent studies have shown the negative health impact of traffic-generated air pollution near major thoroughfares.
- The impact of noise on the potential residents.

2/1/2008

- Areas of open space for residents to utilize since these units may house families. The city cannot regulate who lives in these proposed residents.

Allied Neighborhood Associations requests a full and complete environmental review to address these concerns and other issues. We believe that CEQUA requires a full EIR. We ask you to please support our request.

. Thank you.

Judy Orias president
Allied Neighborhood Associations.

Gil Barry
3130 Braemar Drive
Santa Barbara, CA 93109

January 23, 2008

City of Santa Barbara
Planning Division, attn. K. Kennedy
P.O.P. Box 1990
Santa Barbara, CA 93102-1990

Re: 210 W. Carrillo "Radio Square" MST2007-00554

Comments on Draft Environmental Document

Conclusion: The Draft ND is totally inadequate due to numerous errors and omissions. The Draft ND failed to discuss in depth, and therefore failed to come to the proper conclusion as to potentially significant adverse environmental impacts in the six categories of:

1. Air Quality
2. Soils and groundwater
3. Seismic Safety
4. Visual resources
5. Noise
6. Traffic

A full E.I.R must be prepared for this project due to its huge size and due to its significant adverse environmental impacts.

1. Air Quality: The existing vehicular pollutant exhaust emissions from the existing vehicular traffic congestion on the major arterials of Carrillo and De la Vina Streets create a "hot pocket" of air pollutants at a level which is below the acceptable threshold, therefore Exposing sensitive receptors such as children and elderly or sick people to substantial pollutant exposure. This exposure to air pollution will occur both inside the units and on the outdoor living areas and plazas. This is a significant adverse environmental impact. An actual test of the air quality needs to be done at that intersection.

2. Soils: The proposed parking garage extends down 20 feet deep. The soil report indicated that at times the ground water is 17 feet below grade. The soil report indicates that during excavation of the 20 feet deep hole that groundwater will seep in-and that the site will need dewatering. This water may contain significant chemicals due to the old laundry on the site and such contaminated ground water

must be required to be treated before dumping into our storm system, which goes into our creeks and ocean.

Also, this high potentially contaminated groundwater will seep through the floor slab of the parking structure until it reaches 3 feet deep inside the structure. This is a significant adverse environmental impact on the project's occupants.

3. Seismic Safety: The situation of having the structure extend into high groundwater may result in liquefaction of the soil directly under the structure in an earthquake. The soil report did not measure liquefaction. Liquefaction can only be measured by a special truck, of which there are none in the city of Santa Barbara. One has to bring in a special truck from out of town. A liquefaction test must be done due to the unusually deep structure that may penetrate the ground water and thus be subject to liquefaction. Liquefaction of the soil during an earthquake is a significant adverse environmental impact on the residents of the building.

4. Visual Resources: This project creates a significant adverse environmental impact on the community in that its visual and aesthetic character is not compatible with either the neighborhood or the community. The city landmarks commission as to height, size, bulk and scale rejected the project. The size bulk and scale compatibility is best measured by the F.A.R. The gross F.A.R. ratio of this project is 2.0 and this proves that this project is not compatible with the neighborhood or community because over 99% of all commercial, multifamily residential and mixed use buildings in Santa Barbara have a F.A.R. of less than 1.0, so this project is twice as bulky, as compared to the lot size, as the 1% largest buildings in the city. Because of this the project's aesthetic and visual impact must be studied in depth in the environmental document as a significant adverse environmental impact.

Also, there now exists a significant and cherished **PUBLIC** mountain view as one drives easterly on Carrillo, the main entrance to the city, from the freeway. This wonderful and significant public Mountain View will be blocked by the project. This needs to be studied in the environmental document. This is a significant adverse Environmental impact that cannot be mitigated.

5. Noise: This project is located on a major arterial street and therefore is subjected to a noise level exceeding 70 db. The city noise standard threshold is 60 db outdoor and 45 db indoor. This results in a project in which the windows cannot be opened for air ventilation and this results in a **SIGNIFICANT ADVERSE ENVIRONMENTAL IMPACT** on the residents who are subjected to having to live in a unit in which the windows cannot be opened. The building code requires that a unit have adequate outdoor air ventilation. The reality is that residents will open their operable windows. This will subject the occupants to a significant adverse environmental impact when they breath the polluted air from the hot pocket of air

pollution, and also it will harm their health and hearing loss to be subjected to high levels of sound around 70 db. This will reduce the occupant's quality of life. Several of the required outdoor living areas are subjected to 70db of noise and the noise study required the installation of 6 feet sound walls. These 6 feet sound walls need to be shown on the exterior elevations in order to have their visual impact evaluated by the landmarks commission. Studies have shown that residents with outdoor living spaces subject to 70 db of noise will simply not use them. Therefore a noisy outdoor patio or balcony with a 6 feet sound wall reduces the quality of life for the occupant and results in an outdoor area that does not meet the intent of the ordinance, which requires them.

6. Traffic: At rush hour the westbound traffic on Carrillo forms a bumper-to-bumper cuing line of vehicles waiting to enter the freeway. This causes a level of service F. It is a significant adverse environmental impact on the **residents of the project** to be subjected to living right on a street with a level of service F. This means that there is not adequate existing public infrastructure at that location to accommodate the residents. An adverse environmental impact is not just limited to the impact on the community but also the impact on the residents of the project itself has to be considered.

Also, the traffic study is inadequate in that it uses 'ghost' trips in coming to a conclusion that the traffic generated by the proposed project will be less than that generated by the existing commercial. For example at 7 a.m. rush hour when all the existing businesses are closed there are no traffic trips generated by the existing project but a 55-condo project at 7 a. m., would result in 55 cars going to work assuming 2 residents per unit and 50 % driving to work each morning. It would for a fact add more than 5 new a.m. peak hour trips and that is a significant adverse environmental impact. The traffic study must be revised to study the a.m. peak hour trips by actually going and measuring the actual existing trips.

Lastly, there is talk that the applicant may reduce the size of the project. At this time no such drawings have been formally submitted to the city and therefore the environmental evaluation of the project, the environmental document, and the potential significant adverse environmental impacts, must be made based on the project as actually submitted. In the event that the applicant submits a new revised smaller project then a new environmental study, evaluation, and document must be prepared for that new project after it is actually submitted.

—Sincerely,



Gil Barry

Kennedy, Kathleen

From: J. B. MICALLEF [jbmk@verizon.net]
Sent: Thursday, January 24, 2008 5:18 PM
To: Kennedy, Kathleen
Cc: Blum, Marty; Falcone, Iya; Horton, Roger; House, Grant; Schneider, Helene; Williams, Daniel
Subject: RADIO SQUARE PROJECT

January 24, 2008

Ms. Kathleen Kennedy
Associate Planner
City of Santa Barbara, CA

RE: Radio Square Project

Dear Ms. Kennedy:

I attended today's Radio Square Planning Commission meeting. The City is perpetuating a giant flaw in its planning procedure. Why is so much attention being paid to the individual impact of the Radio Square Project while the City ignores the greater combined impact with the inevitable MTA project at the corner of Carrillo and Chapala, only a block away? The two project impacts should be studied and EIRs prepared with the combined projects in mind.

This aside, the following are my comments if the City will not conduct its planning in a sensible manner.

1. The Radio Square project as a four-story proposal should be rejected. Period.
2. If the three-story proposal is accepted, a full scale Environmental Impact Report should be required.
3. There should be parking spaces required for the residential condominiums in accordance with existing Santa Barbara City ordinances. No variances or exceptions should be made.

I find it difficult to understand how a Negative Declaration was determined for the four-story project proposal with the entry/exit for the residences and commercial spaces both being on Carrillo Street, the busiest thoroughfare in the City. In fact, the entire project does not belong on the corner of Carrillo and De la Vina because of existing traffic conditions.

Please convey this epistle to the members of the Planning Commission.

Sincerely,

James Micallef
1633 Anacapa Street
Santa Barbara, CA 93101

1/28/2008

To: City of Santa Barbara, Planning Division
Attn: Kathleen Kennedy, Associate Planner
P.O. Box 1990, Santa Barbara, CA 93102-1990

February 3, 2008

From: The Gray Family Trust and Eileen Gray
Business Office
1021 De La Vina Street
Santa Barbara, CA 93101

Re: Proposed Negative Declaration (MST2007-00634)

We write this letter in response to the proposed Negative Declaration by City of Santa Barbara Planning Staff for the project at 210 West Carrillo Street, currently Radio Square (MST2007-00634). As the immediate neighbors of this property at 1021 De la Vina Street we believe that we stand to endure significant impacts and certainly economic injury should this project proceed as planned.

We feel that there will be long and short term environmental impacts that require further study, and that some of those impacts either cannot or will not be mitigated under this current proposal. The short term impacts will occur during the construction phase of the project, and we will cover these first.

Short Term Impacts

1. Noise

Four of our rental units directly face the proposed construction site. Given our experience with underground parking construction at the Ralph's Market across the street on the north-west corner of De la Vina and Carrillo Streets, we are certain that there will be significant night-time noise as well as construction noise all day every day. We expect to receive constant noise complaints from our tenants, and expect that they may all opt to vacate our premises.

The applicant has proposed to warn us when there will be significant noise, but offers no plan to actually mitigate the noise. Our tenants should not be expected to accept the potential health damage proceeding from lack of sleep and anxiety caused by extensive night time noise. We as the property owners should not be expected to accept the potential financial loss when tenants decide to move out. If our tenants move out during construction, these units will be rendered unrentable. We feel that the developer and/or the city should indemnify us against any legal complaints as well as post a bond to protect both us and our tenants from any financial losses or property damages proceeding from the construction.

2. Traffic

The construction plan proposes to close the two right hand lanes of De la Vina Street during construction for use as a materials yard and staging area. The construction entry way is proposed to be exactly in front of our ingress from De la Vina Street. It has already become difficult to enter and exit our property due to heavy traffic. This construction plan could only result in making access to our property practically impossible.

The applicant has made no proposal to protect our tenants from the lack of fair access to their homes during the construction phase. Once again, having experienced a large construction project at the Ralph's Market, we feel that this construction period will have very significant impacts on us and on the entire neighborhood.

3. Toxic Dust

The Radio Square site is a toxic mitigation site. We feel that not enough has been done to educate the neighborhood about the nature of the toxins to be removed and the possible risk to their health during removal. We believe that just the knowledge of the risk will be enough to induce many living in the neighborhood to leave, particularly those with children. Since these toxins are known carcinogens, the city should be providing extensive guidance to both the property owners and residents of the neighborhood.

Once again, the applicant has done nothing to and does not plan to perform any neighborhood education as to the potential risk of the clean up.

Long Term Impacts

We believe that this project is growth inducing in general, and does not conform to the City of Santa Barbara General Plan currently under review. No argument has been presented for why this project should be allowed a non-conforming use. We can see no general good to the City that should induce the City to grant a variance from the general plan especially at a time when that plan is under review.

1. Affordable Housing

The project originally proposed contained a good deal of affordable housing. This housing is nearly absent from the current plan. The inducement of this project was that it would be a live-work smart growth project. The ultimate project however will not even theoretically provide housing for those who work on site. This will result in more day-time traffic as those who work in the commercial spaces arrive and depart.

We feel that without the affordable housing inducement, that this project merely serves to further congest an already congested neighborhood.

2. Historical Resources

This neighborhood is architecturally valuable, containing some of the oldest and most representative examples of 19th century Victorian and Craftsman architecture in the City. There is no other "Pueblo Viejo"/Spanish Style architecture on De la Vina Street except for the recently constructed Ralph's. Several buildings including our own have significant historical value, and should not have their context destroyed by a new design that is completely out of character with the neighborhood. Several new buildings in the neighborhood used our building as a model of architecture in order to get permission to build.

The applicant has described this neighborhood as consisting of strip malls and exhausted buildings in error. Many buildings have been and are being lovingly restored by their owners. The applicant never approached the neighborhood with any "visioning" meetings in terms of architecture and style. We feel that while the smaller proposed project is less horrible, the architectural issues remain.

3. Parks

The entire interior Westside of Santa Barbara is woefully underserved by actual park area. Between Oak Park and West Beach there is no park space and not even a school yard at which children can play. At the time of the Ralph's construction, many people felt that the block in which it was constructed offered the best opportunity for a public park.

The city is not strict enough with enforcing some of the "quality of life" elements of CEQA, and does not even consider how to mitigate this issue. Noting that it is an issue at a public meeting, but proposing no solution to the problem does not mitigate the damage.

4. Traffic

We feel that the entire traffic study and its assumptions are suspect. We believe that this project will make the intersections of Carillo and De la Vina even more undrivable than they are now. Given that this is a major emergency services corridor with a fire station across the street from the proposed development, it seems that ANY increase or slowing in traffic flow would be unacceptable.

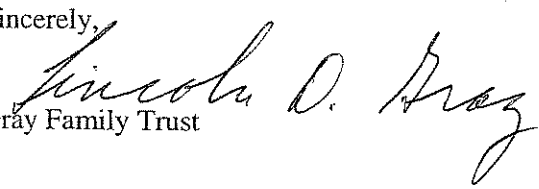
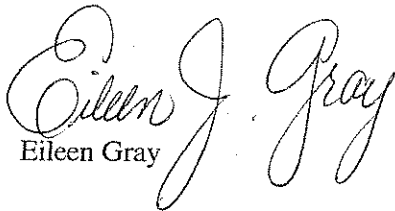
Conclusions

In light of the issues listed about, we strongly urge the City of Santa Barbara Planning Commission to require a full EIR. These issues have not been discussed sufficiently by the developer, and the people who live in the neighborhood are entitled to the full disclosure of information that would result from such a study.

We as the neighboring property owners have additional issues with this project, but are responding only to issues relating to the proposed Negative Declaration at this time.

Sincerely,

Gray Family Trust



Eileen Gray

cc. City Council Members

